

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JOINT MOTION TO SET DISCOVERY DATES

Plaintiff ANTOINE LAND and Defendants FRONTLINE COMMUNICATIONS, INC. and GINA URSO (collectively, the “Parties”), by and through their respective attorneys, respectfully request that the Court grant their Joint Motion to set discovery dates. In support of their Motion, the Parties state as follows:

1. Over the past several months, the Parties, including Comcast Corporation, have engaged in extensive settlement efforts, including enlisting the services of Honorable Judge Wayne R. Anderson. Plaintiffs have worked out a tentative settlement with Comcast and expect to present the Court with a motion for preliminary approval of class wide settlement in the upcoming weeks.

2. The Plaintiffs, however, have not been able to work out a settlement with Defendants FRONTLINE COMMUNICATIONS, INC. and GINA URSO. Accordingly, the Parties wish to resume discovery. This request is being made in good faith and will not cause undue delay or prejudice to any party.

WHEREFORE, the Parties respectfully request that this Court enter an order setting the case schedule as follows.

Fact discovery closed:	January 31, 2012
Plaintiff's expert disclosures due:	December 30, 2011
Defendants' expert disclosures due:	January 30, 2012
Dispositive Motions:	March 30, 2012

Dated: August 16, 2011

ANTOINE LAND By: <u>/s/ Ryan F. Stephan</u> One of His Attorneys James B. Zouras Ryan F. Stephan STEPHAN ZOURAS, LLP 205 N. Michigan Avenue, Suite 2560 Chicago, IL 60601 Tel: 312.233.1550	FRONTLINE COMMUNICATIONS, INC. AND GINA URSO By: <u>/s/ Richard J. Miller</u> One of Their Attorneys Richard J. Miller THE MILLER LAW FIRM, P.C. 1051 Perimeter Drive, Suite 400 Schaumburg, IL 60173 Tel: 847-995-1205
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